



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 25, 2009

Mr. Rafael Flores
Senior Vice President and
Chief Nuclear Officer
Attention: Regulatory Affairs
Luminant Generation Company LLC
P.O. Box 1002
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 – REQUEST FOR ADDITIONAL INFORMATION RELATED TO RESPONSE TO GENERIC LETTER 2008-01, “MANAGING GAS ACCUMULATION IN EMERGENCY CORE COOLING, DECAY HEAT REMOVAL, AND CONTAINMENT SPRAY SYSTEMS” (TAC NOS. MD7813 AND MD7814)

Dear Mr. Flores:

By letter dated October 14, 2008 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML082940033), Luminant Generation Company LLC (Luminant, the licensee) provided a response to the U.S. Nuclear Regulatory Commission (NRC) Generic Letter 2008-01, “Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,” for Comanche Peak Steam Electric Station, Units 1 and 2.

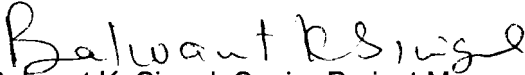
The NRC staff has reviewed the information provided by the licensee and determined that additional information is needed in order to complete the review. A draft copy of the request for additional information (RAI) was forwarded to Mr. Tim Hope of your staff on September 16, 2009, via e-mail. Luminant had discussions with the NRC staff on September 21, 2009, to ensure mutual understanding of the RAI. Mr. Hope agreed to provide the final response within 60 days of the date of this letter.

R. Flores

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If you have any questions, please contact me at 301-415-3016 or via e-mail at balwant.singal@nrc.gov.

Sincerely,


Balwant K. Singal, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

Enclosure:
As stated

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REQUEST FOR ADDITIONAL INFORMATION
RESPONSE TO GENERIC LETTER 2008-01, "MANAGING GAS
ACCUMULATION IN EMERGENCY CORE COOLING, DECAY HEAT
REMOVAL, AND CONTAINMENT SPRAY SYSTEMS"
LUMINANT GENERATION COMPANY LLC
COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2
DOCKET NOS. 50-445 AND 50-446

By letter dated October 14, 2008 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML082940033), Luminant Generation Company LLC (Luminant, the licensee) provided a response to U.S. Nuclear Regulatory Commission (NRC) Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," for Comanche Peak Steam Electric Station (CPSES), Units 1 and 2.

The NRC staff has reviewed the information provided by the licensee and determined that the following additional information is needed in order to complete its review.

Guidance on NRC staff expectations is provided in the NRC letter dated May 28, 2009 (Reference 1). As clarified in Nuclear Energy Institute (NEI) communications, this guidance is generally consistent with NEI guidance provided previously to industry in its letter dated March 20, 2008 (Reference 2). The NRC staff requests the licensee to provide its response to the following request for additional information using the guidance provided by Reference 1.

1. The licensee plans to conduct ultrasonic inspections of the subject systems with a frequency based on unspecified reactor system conditions. If these inspections will be less frequent than once every 31 days, please provide a justification. Also, please include a discussion of any conditions and parameters used to determine the need for inspections; such as pressures in the accumulator and piping, leakage rates, level indicators, and the methods used to monitor these parameters and conditions.
2. In Reference 4, the licensee states that if "Gas voids [are] detected [they] are documented, evaluated, and dispositioned in the Comanche Peak Corrective Action Program (CAP)." Please discuss follow-up actions, such as quantifying and trending the volume of the void, as well as the methods used to fill and vent, and measure the amount of gas vented.
3. The licensee stated that "Comanche Peak verifies that the pipes are full... after any maintenance or operations activity which drains portions of the system" (Reference 4). Please clarify the extent to which this verification ensures gas was not transported into a

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high point that was previously considered gas-free.

4. Please describe the Gas Intrusion Program (GIP) noted in Reference 4, Section A.3.2; including a brief description of training.

REFERENCES

- 1 Ruland, William H., U.S. Nuclear Regulatory Commission, letter to James H. Riley, Nuclear Energy Institute, "Preliminary Assessment of Responses to Generic Letter 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,' and Future NRC Staff Review Plans," dated May 28, 2009 (ADAMS Accession No. ML091390637).
- 2 Riley, James H., Nuclear Energy Institute, "Generic Letter (GL) 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Contain Spray Systems' Evaluation and 3 Month Response Template," Letter to Administrative Points of Contact from Director, Engineering, Nuclear Generation Division, Nuclear Energy Institute, Enclosure 2, "Generic Letter 2008-01 Response Guidance," March 20, 2008.
- 3 Case, Michael J., U.S. Nuclear Regulatory Commission, "NRC Generic Letter 2008-01: Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," dated January 11, 2008 (ADAMS Accession No. ML072910759).
- 4 Blevins, M., Luminant Generation Company LLC, letter to U.S. Nuclear Regulatory Commission, "Comanche Peak Steam Electric Station, Docket Nos. 50-445 and 50-446, Nine-Month Response to Generic Letter 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,'" dated October 14, 2008 (ADAMS Accession No. ML082940033).

R. Flores

- 2 -

If you have any questions, please contact me at 301-415-3016 or via e-mail at balwant.singal@nrc.gov.

Sincerely,

/ra/

Balwant K. Singal, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

Enclosure:
As stated

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ADAMS Accession No.: ML092640556

*Memo dated September 9, 2009

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